Applicant respectfully requests reconsideration and allowance of the subject application in view of the foregoing amendments and the following remarks.

Claims 1, 3-8, 10, 12-15, 22, 24-25 and 41 are pending in the application, with claims 17-21 and 26-40 being withdrawn. Claims 1, 10, 17, 20, 22, 26, 31, and 37 are independent. Claims 2, 9, 11, 16 and 23 were previously canceled and claims 1, and 4-6 are amended herein. Support for the claim amendments and additions can be found in the original disclosure. No new matter has been added.

STATEMENT OF SUBSTANCE OF INTERVIEW

Initially, Applicant wishes to thank the Examiner for conducting an interview with Applicant's representatives, Damon Kruger along with Elizabeth Zehr, on Wednesday January 14, 2009.

During the interview, Applicant's representatives and the Examiner discussed the §103(a) rejection as applied to claim 1. Applicant's representatives presented arguments during the interview to distinguishing the claims from the cited references. Applicant's representatives and the Examiner did not reach an agreement as to the amendments to claim 1. The subject matter of the interview, and other remarks, are included below under their respective sections to assist the Examiner in more fully understanding the Applicant's position on the rejections under §103(a).

§112, Second Paragraph Rejection

Claim 6 was rejected under 35 U.S.C. §112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. More specifically, the Office states there is insufficient antecedent basis for the limitations "the inline elements" and "the shape" recited in claim 6. (Office Action, page 3).

Applicant has herein amended claim 6 to recite "inline elements" and "a shape" thus providing sufficient antecedent basis. Therefore, Applicant respectfully requests reconsideration and withdrawal of this rejection.

§ 103 REJECTIONS

Claims 1, 3-7, 10, 12-15, 22, 24, 25, and 41 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication No. 2004/0133855 ("Blair") in view of W3Schools.com "CSS Pseduo-Classes" ("W3Schools"), and further in view of U.S. Patent Publication No. 2001/0044809 ("Parasnis"), and further in view of "New Features in Internet Explorer 5" ("IE5"). Claim 8 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Blair, W3Schools, Parasnis, and IE5, and further in view of U.S. Patent Publication No. 2005/0044499 ("Allen").

Applicant respectfully traverses the rejection, and requests that the rejection be reconsidered and withdrawn, and further requests that the rejections be reconsidered and withdrawn for at least the reasons that follow.

Independent claim 1, as presently presented, is directed to "A method of compiling formatted video content into a binary format", and recites:

> A method of compiling formatted video content into a binary format, comprising:
>
> processing a formatted video content containing textual words with a process that is specific to the format of the video content and a process that is specific to a predetermined client, the formatted video content including:
>
> Cascading Style Sheets (CSS) that select an element of the formatted video content by a pseudo-class, and
>
> *a localization dictionary to translate a portion of the textual words of the formatted video content into a plurality of languages.*

(Emphasis added). Applicant respectfully submits that Blair in view of W3Schools and Parasnis fails to teach or suggest the recitations of claim 1. Specifically, Blair in view of the cited art fails to teach or suggest "translate a portion of the textual words of the formatted video content into a plurality of languages " as recited in claim 1.

With respect to the rejection of claim 1, the Office recites: "Blair and W3Schools do not disclose a dictionary for translation. Parasnis teaches a localization dictionary (reference file, para. 36) to translate one or more textual words of formatted video content into a plurality of languages (para. 36, replaced with localized objects)." (Office Action, page 4). Applicant agrees with the Office that Blair and W3Schools do not explicitly teach or suggest a localization dictionary; however, Applicant respectfully traverses the assertion that Parasnis teaches a localization dictionary. Rather, Applicant submits, as discussed further below, that Parasnis renders the entire HTML-based UI in "one of several different languages" rather than "translate a portion of the textual words of the formatted video content into a plurality of languages" as recited in claim 1.

Parasnis generally pertains to enabling "an HTML-based UI to support a plurality of different languages using just a single set of HTML documents (one for each page required)." (Parasnis, paragraph [0034]). Specifically, "an HTML document is created so as to include a plurality of placeholder values corresponding to text, graphic, and/or media objects that are to be rendered in a specified language when the HTML document is displayed by a browser, to produce the UI page." When "a user selects the specified language from a list of languages supported by the application program's UI", the application "extracts an appropriate set of localized strings in the specified language from PPINTL.dll, and writes these strings into a reference file called global.js" such that "the placeholder values in the HTML document are replaced with localized objects based on the name-value pairs in the global.js reference file" (Parasnis, paragraph [0036]). Thus, in Parasnis, the objective is to render *the entire* HTML-based UI in "one of several different languages" rather than "translate *a portion* of the textual words of the formatted video content into a plurality of languages" as recited in claim 1. (Emphasis added).

Claim 1 is supported by the specification on at least pages 8 and 9 paragraph [0023] and by element 104 in Figure 1. Accordingly, independent claim 1 is believed allowable.

Dependent claims 3-6, 7-9, and 41 depend from independent claim 1 and are believed allowable by virtue of this dependency, as well as for additional features that they recite. Applicant also respectfully requests individual consideration of each dependent claim.

Specifically, Claim 4, as amended, recites:

The method as defined in Claim 1, further comprising:

translating the video content in the binary format with a document object model into a document object model hierarchy corresponding to the video content ;

gathering each different style of translated video content based on different pseudo-class selectors; and

presenting the gathered video content using the document object model hierarchy.

Applicant respectfully submits that Blair either singly or in view of the cited art fails to teach or suggest "gathering each different style of translated video content *based on different pseudo-class selectors*" as presently recited in independent claim 4. Accordingly, claim 4 is believed allowable.

Independent claim 10, as presently presented, is directed to "A computer storage medium", and recites:

A computer storage medium storing instructions that when executed cause one or more processors to:

capture a presentation result of processed video content, the video content includes *a localization dictionary to translate one or more textual words of the video content into a plurality of languages*, wherein the presentation includes layout, rendering, UI interaction, and dynamic aspects of the video content, and wherein the capture comprises processing the video content with a routine that is specific to the format of the video content and a client-specific routine specific to a predetermined client; and

create one or more serialized binary bit streams corresponding to the presentation result, wherein the serialized binary bit streams facilitates visual rendering and end user interaction with the serialized binary bit streams through a user interface.

(Emphasis added). Blair either singly or in view of the cited art fails to teach or suggest "a localization dictionary to translate one or more textual words of the video content into a plurality of languages" as presently recited in independent claim 10.

Applicant incorporates similar reasoning as presented above in response to the rejection of claim 1. Specifically, Parasnis renders *the entire* HTML-based UI in "one of several different languages" rather than "translate *one or more* textual words of the video content into a plurality of languages" as recited in claim 10. (Emphasis added).

Dependent claims 12-15 depend from independent claim 10 and are believed allowable by virtue of this dependency, as well as for additional features that they recite. Applicant also respectfully requests individual consideration of each dependent claim.

Independent claim 22, as presently presented, is directed to "A Multiple System Operation system", and recites:

> A Multiple System Operation system, comprising:
> storage for video content in an original markup language that includes layout, rendering, UI interaction, and dynamic aspects of the video content,
> wherein the video content includes *a localization dictionary to translate one or more textual words of the video content into a plurality of languages*; and
> one or more headends each having one or more servers,
> wherein each said server includes a compiler to compile the video content in the original markup language into video content in a binary format that includes the layout, rendering, UI interaction, and dynamic aspects of the video content from the original markup language,
> wherein the compiler facilitates processing the video content in the original markup language with a markup-specific routine that is specific to the original markup language, and a client-specific routine specific to a predetermined client for rendering the video content in

the binary format so as to be consistent with the original markup language.

(Emphasis added). Blair either singly or in view of the cited art fails to disclose or suggest "a localization dictionary to translate one or more textual words of the video content into a plurality of languages" as presently recited in independent claim 22.

Applicant incorporates similar reasoning as presented above in response to the rejection of claim 1. Specifically, Parasnis renders *the entire* HTML-based UI in "one of several different languages" rather than *"one or more* textual words of the video content into a plurality of languages" as recited in claim 12. (Emphasis added).

Dependent claims 24-25 depend from independent claim 22 and are believed allowable by virtue of this dependency, as well as for additional features that they recite. Applicant also respectfully requests individual consideration of each dependent claim.

CONCLUSION

For at least the foregoing reasons, claims 1, 3-8, 10, 12-15, 22, 24-25 and 41 are in condition for allowance. Applicant respectfully requests reconsideration and withdrawal of the rejections and an early notice of allowance.

The arguments and amendments presented herein were necessitated by the most recent Office Action, and could not have been presented previously because Applicant earnestly believed that the claims were in condition for allowance at the time of filing the previous response.

If any issue remains unresolved that would prevent allowance of this case, **Applicant requests that the Examiner contact the undersigned attorney to resolve the issue.**

Respectfully Submitted,

Dated: _2009 - 02 - 25_   By: _____
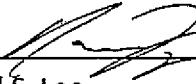
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